

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE ING GROEP, N.V. ERISA LITIGATION)	Master File No. 1:09-cv-00400-JEC
)	
)	
THIS DOCUMENT RELATES TO:)	
All Actions)	
)	

**Plaintiffs' Motion for Award of Attorneys' Fees,
Reimbursement of Expenses, and
Incentive Compensation Awards**

Counsel for Plaintiffs Kent Sewright and Deadre D. Diggs respectfully move for entry of the proposed order:

- awarding Plaintiffs' Counsel and Liaison Counsel \$1,050,000 in attorneys' fees;¹
- granting Plaintiffs' Counsel and Liaison Counsel reimbursement of \$18,327.87 in expenses;
- awarding \$7,500 each to Sewright and Diggs in incentive compensation; and
- granting such further and other relief as the Court deems just and proper.

¹ This motion incorporates all provisions of the Stipulation and Agreement of Settlement dated November 5, 2012 (Dkt. No. 68-2), including all defined terms.

This motion is based on the accompanying Memorandum, the Declaration of Francis A. Bottini, Jr., together with exhibits, and all the papers and proceedings in this action.

Dated: April 30, 2013

Respectfully submitted,

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s/ David J. Worley

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CERTIFICATE OF SERVICE

I certify that I caused a copy of the foregoing Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Incentive Compensation Awards, together with all attachments, to be served on all counsel of record using the CM/ECF system on the 30th day of April, 2013.

Dated: April 30, 2013

s/ David J. Worley

David J. Worley